

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<b>In re:</b>	§	Chapter 11
	§	
<b>DELPHI CORPORATION, <i>et al.</i></b>	§	Case No. 05-44481 (RDD)
	§	
Debtors.	§	(Jointly Administered)
	§	

**JOINT MOTION OF JP MORGAN CHASE BANK, N.A. AND BRAZEWAY,  
INC. FOR RELIEF FROM AND RECONSIDERATION OF ORDER  
MODIFYING CLAIMS ASSERTING RECLAMATION IDENTIFIED IN  
DEBTOR'S TWENTY-FIRST OMNIBUS CLAIMS OBJECTION**

NOW COME JP Morgan Chase Bank, N.A. and Brazeway, Inc. (collectively "Movants") and pursuant to B.R.P. 9024, B.R.P. 3008, and other applicable provisions of the Rules of Bankruptcy Procedure and the Federal Rules of Civil Procedure hereby jointly move this court for relief from and reconsideration of that certain Order Modifying Claims Asserting Reclamation Identified in Debtor's Twenty-First Omnibus Claims Objection (the said Order being **Docket No. 10728**) and in support thereof have filed a Memorandum of Law, the arguments and authorities of which are incorporated herein, together with the Affidavits of Howard J. Grossman, Neelima Velavolu, Bruce N. Elliott and Terry Sheehan also filed herewith.

WHEREFORE, the Movants respectfully request this court to enter an order:

- (a) Granting this Motion for Reconsideration; and
  - (b) Vacating and setting aside the Modification Order as to the Reclamation Claim;
- and
- (c) Reinstating the Reclamation Claim in the amount set forth in the JP Morgan Proof of Claim; and

(d) Permitting the disposition of the Reclamation Claim to be made pursuant to and consistent with the provisions of the Order to Amend Reclamation Procedures; and

(e) Granting such other and further relief as is just and proper.

Dated: November 26, 2007

/s/ Bruce N. Elliott  
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